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January 7, 2006

Brian Amme, Project Manager Bureau of Land Management P.O. Box 12000 Reno, NV 89520-0006

Re: BLM Programmatic EIS for Pesticide Vegetation Treatments in 17 Western States

Mr. Amme:

- I would like to comment on the Bureau of Land Management's proposed wide-scale use of herbicides on my state, New Mexico, and in the 16 other western states affected by the proposal, for the following reasons:
- * Wide-scale application of any herbicide will affect not only targeted non-native or overgrown vegetation, but also beneficial and fragile flora;
- * Many, if not all, of the herbicides proposed for use in widescale applications are proven to be harmful to wildlife, livestock and humans;
- * Even if applied in the complete absence of livestock and humans, these chemicals will be introduced into environment and our food chain and will eventually find their way into our bodies;
- * If this is an effort to protect communities which have invaded wild lands from fire, it is the responsibility of those who chose to build in an area subject to wildfires to protect their ill-placed homes. Wholesale destruction of vegetation in wild lands to protect a few reckless homeowners is unwarranted;
- * If this proposed action has been instigated by businesses which graze livestock on public lands; and whose bottom line would be

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- enhanced by using public funds and endangering the public's lives and health and the health of our ecosystems; then such action, being against the interests of all but a handful of the residents of the states targeted by the action, is illegal;
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- * No Environmental Impact Statement can reliably predict the cumulative and long-term effects of wide-scale application of any chemical; relatively toxic, such as the proposed herbicides; or relatively benign, such as the fire retardant dropped on forest fires. Therefore any EIS, however well-researched, is inadequate and any action based on such a Statement is illegal.
- I therefore recommend your Proposed Option C; using existing methods of controlling invasive, non-native vegetation and wildfires with might threaten human habitation.
- If you and your colleagues insist on proceeding with the proposed and ill-considered wide-scale application of herbicides, I suggest that it begin in the area surrounding Reno, Nevada, so that you and your families may verify the safety of the proposed program.

Does the term "Agent Orange" ring a bell?

Sincerely,

Adele E. Zimmermann

cc: Organic Consumers Association

Bill Richardson, Governor of the State of New Mexico

Senator Jeff Bingaman, New Mexico Senator Pete Domenici, New Mexico

Congressman Tom Udall, 3rd Congressional District, New Mexico